

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: _____/19

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JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,Plaintiffs designate
NEW YORK COUNTY
as place of trial.*Plaintiffs,*

-against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,The basis of venue is the
location where a
substantial part of the
events or omissions giving
rise to these claims
occurred, the residence of
at least one plaintiff and
the residence of defendant
KahnSUMMONS*Defendants.*Plaintiffs reside in New
York and other States-----X
To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York) and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, NEW YORK COUNTY ON 12/3/19 IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

Defendants' Addresses:

**RICHARD D. KAHN, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
130 East 75th Street
New York, NY 10021

**DARREN K. INDYKE, in his capacity as a co-executor
of the ESTATE OF JEFFREY EDWARD EPSTEIN**
6030 Le Lac Road
Boca Raton, FL 33496

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE
DOE IV, JANE DOE V, JANE DOE VI, JANE DOE
VII, JANE DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

-against -

**VERIFIED
COMPLAINT**

DARREN K. INDYKE and RICHARD D. KAHN, in
their capacities as the executors of the ESTATE OF
JEFFREY EDWARD EPSTEIN,

Defendants.

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COMPLAINT AND JURY TRIAL DEMANDED

Plaintiffs JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV, JANE DOE
V, JANE DOE VI, JANE DOE VII, JANE DOE VIII and JANE DOE IX, by and through
their counsel at MERSON LAW, PLLC, and as for their complaint in this action against
defendants DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the
executors of the ESTATE OF JEFFREY EDWARD EPSTEIN, hereby allege the following:

NATURE OF THE CLAIMS

1. Jeffrey Edward Epstein (hereinafter, "Epstein") sexually abused, assaulted and battered many women and children, including the plaintiffs herein.
2. These nine women come forward to stand up for themselves and others, after they were sexually abused and assaulted by Epstein.
3. Some of these women were raped by Epstein, repeatedly.
4. All of these women were sexually battered, assaulted, and abused by Epstein as a part of the same conduct, occurrence, plan, scheme and transaction that was perpetrated,

conducted, organized and/or performed in New York City, Palm Beach, Florida, New Mexico, the U.S. Virgin Islands and other places by Epstein and his associates.

5. Epstein orchestrated a massive sex trafficking network to obtain hundreds of girls for himself for sexual gratification, and additionally lent these girls out to other wealthy and/or powerful individuals within his network to be sexually abused.

6. As expressed by United States District Judge Kenneth Marra in his opinion in *Doe I. V. United States*, “From between 1999 and 2007, Jeffrey Epstein abused more than thirty minor girls... at his mansion in Palm Beach, Florida, and elsewhere in the United States and overseas... In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually... Epstein worked in concert with others to obtain minors not only for his own sexual gratification, but also for the sexual gratification of others.” (*Doe I. v. United States*, 359 F. Supp. 3d 1201, 1204)

7. Epstein committed sexual assault, sexual battery, intentional infliction of emotional distress and negligent infliction of emotional distress pursuant to New York common law.

VENUE, JURISDICTION AND TIMELINESS

8. The Estate of Jeffrey Epstein, which is being presided over by defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the estate of JEFFREY EDWARD EPSTEIN**, includes a residence in New York, New York, that was occupied by Jeffrey Epstein before his death earlier this year.

9. On information and belief, this Court has personal jurisdiction over the Estate of Jeffrey Epstein pursuant to New York Civil Practice Law and Rules (“C.P.L.R.”) Sections 301 and 302 because defendant **RICHARD D. KAHN** is a resident of New York, plaintiffs reside in

New York and other States, defendants operate in New York, transact business in New York, and own, use or possess real property within New York and many of the acts of sexual abuse and as part of this nefarious plan and course of conduct perpetrated by Epstein occurred in New York, New York.

10. This action has been timely filed pursuant to the Child Victims Act (CPLR § 214-g). The actions described herein constitute sexual offenses by Epstein under New York Penal Law Article 130, and were committed against several of the named plaintiffs when they were children less than eighteen years of age, for which they suffered physical, psychological and other injuries as a result.

11. This action has also been timely filed pursuant to CPLR § 215(8)(a) which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise and sexual conduct, including sex with minors and by force, from which plaintiffs' claims arise, was terminated on August 29, 2019.

12. Any statute of limitations applicable to plaintiffs' claims, if any, is tolled due to the continuous and active deception, duress, fraud, threats of retaliation and other forms of misconduct that Epstein and his co-conspirators used to silence his many victims, including plaintiffs. Epstein's actions deprived plaintiffs of their opportunity to commence this lawsuit before his death.

13. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing defendants to do so would be unjust. Epstein and his employees intimidated each of his victims into silence by threatening their lives and their livelihoods. Epstein and his employees

therefore prevented plaintiffs from commencing this lawsuit before his death. By using threats in accompaniment with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls, including plaintiffs, for the duration of his life.

14. The plaintiffs intend to take full discovery of the Estate of Jeffrey Epstein and all associates, family members and friends to determine who knew what and when.

15. At all material times herein mentioned, Epstein, and his associates, operated, transacted business, owned, used, maintained and/or possessed real and other property, equipment and apparatus within New York City, which he utilized as the base of his operations for his sexual exploitation of minor girls and women, including plaintiffs herein.

PARTIES

16. Several of the named plaintiffs, victims of sex trafficking and sexual abuse, have been identified by pseudonym because this matter is of a highly sensitive and personal nature, and public disclosure of their identities may subject them to further humiliation, shame, and emotional distress.¹

17. Plaintiffs are all United States citizens, domiciled in New York and several other States.

18. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and

¹ Plaintiffs use a pseudonyms because they are victims of sex crimes pursuant to N.Y. Civ. Rights § 50-b and other statutory and common law principles.

responsibilities. On information and belief, the Estate of Jeffrey Epstein maintained multiple properties in the United States, including, but not limited to, New York, New York and Palm Beach, Florida.

19. Defendant Darren K. Indyke is sued in his capacity as appointed executor of the Estate of Jeffrey Edward Epstein.

20. Defendant Richard D. Kahn is sued in his capacity as appointed executor of the Estate of Jeffrey Edward Epstein.

FACTS OF THE CASE

21. Starting in or about 1990 and continuing for a period of time thereafter, when plaintiff Jane Doe I was approximately fourteen-years-old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her.

22. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe I suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

23. Starting in or about 1985, when plaintiff Jane Doe II was twenty-three-years-old, Epstein sexually assaulted, abused, and battered her.

24. As a result of the aforementioned sexual assault, abuse and battery, plaintiff Jane Doe II suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

25. Starting in or about 2003 and continuing for a period of time thereafter, when plaintiff Jane Doe III was approximately thirteen-years-old, Epstein and his associates repeatedly sexually assaulted, abused, battered and raped her.

26. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe III suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

27. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe IV was approximately fifteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

28. As a result of the aforementioned sexual assault, abuse, battery and rape, plaintiff Jane Doe IV suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

29. Starting in or about 2004 and continuing for a period of time thereafter, when plaintiff Jane Doe V was nineteen-years-old, Epstein sexually assaulted, abused, battered and forced her to perform oral sex on him.

30. As a result of the aforementioned sexual assault, abuse, battery and forced oral sex, plaintiff Jane Doe V suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

31. Starting in or about 2001 and continuing for a period of time thereafter, when plaintiff Jane Doe VI was nineteen-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

32. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VI suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

33. Starting in or about 2007 and continuing for a period of time thereafter, when plaintiff Jane Doe VII was twenty-one-years-old, Epstein and his associates sexually assaulted, abused, and battered her.

34. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VII suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

35. Starting in or about 2000 and continuing for a period of time thereafter, when plaintiff Jane Doe VIII was twenty-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

36. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe VIII suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

37. Starting in or about 2002 and continuing for a period of time thereafter, when plaintiff Jane Doe IX was twenty-two-years-old, Epstein and his associates sexually assaulted, abused, battered and raped her.

38. As a result of the aforementioned sexual assault, abuse, battery and rapes, plaintiff Jane Doe IX suffered severe and serious injuries, including severe emotional distress, physical manifestations of, physical and other injuries.

**AS AND FOR A FIRST CAUSE OF ACTION FOR
BATTERY OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

39. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 38., inclusive, with the same force and effect as if hereafter set forth at length.

40. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

41. In or about 1990 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe I on several occasions when she was a minor child.

42. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

43. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

44. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and Plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

45. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

46. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

47. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SECOND CAUSE OF ACTION FOR
ASSAULT OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

48. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 47., inclusive, with the same force and effect as if hereafter set forth at length.

49. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

50. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

51. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

52. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

53. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

54. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

55. This action falls within the exceptions to Article 16 of the C.P.L.R

**AS AND FOR A THIRD CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE I AS TO JEFFREY EDWARD EPSTEIN**

56. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 55., inclusive, with the same force and effect as if hereafter set forth at length.

57. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

58. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

59. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

60. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

61. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

62. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

63. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 62., inclusive, with the same force and effect as if hereafter set forth at length.

64. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

65. In or about 1985, Jeffrey Edward Epstein sexually abused plaintiff when she was twenty-three-years-old.

66. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

67. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional

and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

68. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

69. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

70. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

71. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

72. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 71., inclusive, with the same force and effect as if hereafter set forth at length.

73. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

74. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

75. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

76. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

77. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

78. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

79. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE II AS TO JEFFREY EDWARD EPSTEIN**

80. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 79., inclusive, with the same force and effect as if hereafter set forth at length.

81. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

82. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

83. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

84. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

85. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

86. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS FOR A SEVENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

87. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 86., inclusive, with the same force and effect as if hereafter set forth at length.

88. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

89. In or about 2003, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe III when she was a minor child.

90. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

91. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

92. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

93. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

94. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

95. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

96. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 95., inclusive, with the same force and effect as if hereafter set forth at length.

97. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

98. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

99. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

100. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

101. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

102. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

103. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE III AS TO JEFFREY EDWARD EPSTEIN**

104. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 103., inclusive, with the same force and effect as if hereafter set forth at length.

105. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

106. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

107. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

108. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

109. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

110. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

111. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 110., inclusive, with the same force and effect as if hereafter set forth at length.

112. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

113. In or about 2001, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe IV when she was a minor child.

114. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

115. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

116. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

117. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

118. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

119. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

120. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 119., inclusive, with the same force and effect as if hereafter set forth at length.

121. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

122. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

123. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

124. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

125. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

126. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

127. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWELTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IV AS TO JEFFREY EDWARD EPSTEIN**

128. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 127., inclusive, with the same force and effect as if hereafter set forth at length.

129. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

130. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

131. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

132. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

133. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

134. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A THIRTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

135. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 134., inclusive, with the same force and effect as if hereafter set forth at length.

136. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

137. In or about 2004, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe V when she was nineteen-years-old.

138. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

139. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

140. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

141. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

142. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

143. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTEENTH CAUSE OF ACTION FOR ASSAULT
OF JANE DOE V AS TO DEFENDANT JEFFREY EDWARD EPSTEIN**

144. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 143., inclusive, with the same force and effect as if hereafter set forth at length.

145. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

146. Epstein's predatory, sexual and unlawful acts against plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

147. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

148. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

149. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

150. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

151. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE V AS TO JEFFREY EDWARD EPSTEIN**

152. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 151., inclusive, with the same force and effect as if hereafter set forth at length.

153. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

154. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

155. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

156. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

157. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

158. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

159. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 158., inclusive, with the same force and effect as if hereafter set forth at length.

160. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

161. In or about 2001 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VI when she was approximately nineteen-years-old.

162. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

163. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

164. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

165. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

166. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

167. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SEVENTEENTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

168. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 167., inclusive, with the same force and effect as if hereafter set forth at length.

169. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

170. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

171. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

172. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

173. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

174. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

175. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR AN EIGHTEENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VI AS TO JEFFREY EDWARD EPSTEIN**

176. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 175., inclusive, with the same force and effect as if hereafter set forth at length.

177. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

178. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

179. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

180. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

181. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

182. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A NINETEENTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

183. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 182., inclusive, with the same force and effect as if hereafter set forth at length.

184. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

185. In or about 2007 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VII when she was approximately twenty-one-years-old.

186. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

187. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

188. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

189. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

190. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

191. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTIETH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

192. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 191., inclusive, with the same force and effect as if hereafter set forth at length.

193. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

194. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

195. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

196. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

197. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

198. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

199. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIRST CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VII AS TO JEFFREY EDWARD EPSTEIN**

200. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 199., inclusive, with the same force and effect as if hereafter set forth at length.

201. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

202. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

203. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

204. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

205. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

206. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SECOND CAUSE OF ACTION FOR
BATTERY OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

207. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 206., inclusive, with the same force and effect as if hereafter set forth at length.

208. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

209. In or about 2000 and continuing thereafter, Jeffrey Edward Epstein sexually abused plaintiff Jane Doe VIII when she was approximately twenty-years-old.

210. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

211. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

212. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and Plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

213. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

214. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

215. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-THIRD CAUSE OF ACTION FOR
ASSAULT OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

216. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 215., inclusive, with the same force and effect as if hereafter set forth at length.

217. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

218. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

219. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

220. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

221. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

222. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

223. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FOURTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE VIII AS TO JEFFREY EDWARD EPSTEIN**

224. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 223., inclusive, with the same force and effect as if hereafter set forth at length.

225. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

226. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, Plaintiff to suffer severe emotional distress.

227. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

228. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

229. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

230. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-FIFTH CAUSE OF ACTION FOR
BATTERY OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

231. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 230., inclusive, with the same force and effect as if hereafter set forth at length.

232. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

233. In or about 2002 and continuing thereafter, Jeffrey Edward Epstein sexually abused Plaintiff Jane Doe IX when she was approximately twenty-two-years-old.

234. Epstein's predatory, sexual, and unlawful acts against plaintiff amounted to a series of harmful and offensive contacts to plaintiff's person, all of which were done intentionally by him to her without consent.

235. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish, emotional and physical injuries, as well as economic losses, those total damages in amounts to be proven at trial.

236. By reason of the foregoing, plaintiff was caused to sustain severe and serious personal injuries and was caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature, and plaintiff was incapacitated from attending her regular activities and was caused to expend sums of money for medical care on her behalf.

237. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants and others from future similar conduct.

238. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

239. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SIXTH CAUSE OF ACTION FOR
ASSAULT OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

240. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 239., inclusive, with the same force and effect as if hereafter set forth at length.

241. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

242. Epstein's predatory, sexual and unlawful acts against plaintiff created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by him to her without consent.

243. As a direct and proximate result of the aforementioned assault, plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

244. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

245. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendants in such sums as a jury would find fair, just and appropriate to deter said defendants and others from future similar misconduct.

246. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

247. This action falls within the exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A TWENTY-SEVENTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
OF JANE DOE IX AS TO JEFFREY EDWARD EPSTEIN**

248. Plaintiffs repeat reiterate, and reallege each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 247., inclusive, with the same force and effect as if hereafter set forth at length.

249. On information and belief, defendants **DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN**, act as the successor-in-interest and/or obligor to Epstein's assets, obligations and responsibilities.

250. Jeffrey Edward Epstein engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

251. As a proximate result of the aforementioned assaults and batteries to plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

252. Jeffrey Edward Epstein committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling Plaintiff to recover punitive damages in amounts to be proven at trial.

253. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

254. This action falls within the exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiffs demand judgement against defendants in such sum as a jury would find fair, adequate and just containing the following relief:

A. A declaratory judgement that the actions, conduct and practices of defendants complained of herein violated the laws of the State of New York;

B. An injunction and order permanently restraining defendants from engaging in such unlawful conduct;

C. An award of damages in an amount to be determined at trial, plus prejudgment interest, to compensate plaintiffs for all monetary and/or economic harm; harm to their personal and professional reputations and loss of career fulfillment; for all non-monetary and/or compensatory harm, including but not limited to, compensation for physical anguish and mental

anguish; all other monetary and/or non-monetary losses suffered by plaintiffs; and that by reason of the foregoing, plaintiffs sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;

D. An award of punitive damages;

E. An award of costs that plaintiffs have incurred in this action, as well as plaintiffs' reasonable attorney's fees to the fullest extent permitted by law; and.

F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
December 3, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE
IV, JANE DOE V, JANE DOE VI, JANE DOE VII, JANE
DOE VIII and JANE DOE IX,

Index No.: _____/19

Plaintiffs,

-against -

**ATTORNEY
VERIFICATION**

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of
New York State, and a member of the firm **MERSON LAW, PLLC**, attorneys for the
plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true;

That the sources of his information and knowledge are investigations and records in the
file; and,

That the reason this verification is made by affirmant and not by the plaintiffs is that the
plaintiff are not within the County where the attorney has his office.

Dated: New York, New York
December 3, 2019



JORDAN K. MERSON

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

**JANE DOE I, JANE DOE II, JANE DOE III, JANE
DOE IV, JANE DOE V, JANE DOE VI, JANE DOE
VII, JANE DOE VIII and JANE DOE IX**

Plaintiffs,

Index No.: 119

-against -

DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY EDWARD EPSTEIN,

CLIENT VERIFICATION

Defendants.

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

REDACTED, being duly sworn, deposes and says that:

I am a plaintiff in the within action; I have read the foregoing Complaint and know the contents thereof; the same is true to my own knowledge, except as to the matters therein state to be alleged on information and belief, and as to those matters I believe them to be true.

Dated: New York, New York
December 2, 2019

REDACTED

REDACTED

Sworn to before me this
2nd day of December 2019

NOTARY PUBLIC

LEIDEN E APARICIO
Notary Public, State of New York
No. 01AP6371383
Qualified in Queens County
Commission Expires February 26, 2020

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE I, JANE DOE II, JANE DOE III, JANE DOE IV,
JANE DOE V, JANE DOE VI, JANE DOE VII, JANE DOE VIII
and JANE DOE IX,

Plaintiffs,

- against -

DARREN K. INDYKE and RICHARD D. KAHN, in their
capacities as the executors of the ESTATE OF JEFFREY
EDWARD EPSTEIN,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC

Attorneys for Plaintiffs

Office and P.O Address, Telephone

150 East 58th Street, 34th Floor
New York, New York 10155
(212) 603-9100

To: All Parties
